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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MARKMAN BIOLOGICS CORP. and ALAN
SHINDERMAN,

Defendant.

and

ASPEN ASSET MANAGEMENT
SERVICES, LLC

Case No.: 2:23-cv-00288-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
MOTIONS TO COMPEL**

Defendant Alan Shinderman (“Mr. Shinderman”), by and through their undersigned counsel of record, and Plaintiff, Securities and Exchange Commission (“Plaintiff”), by and through their undersigned counsel of record, hereby stipulate and agree as follows:

1. There are ongoing discovery disputes in this case as reflected by the SEC’s motion to compel (ECF No. 65), motion for leave to take a second deposition from Mr. Shinderman (ECF No. 71), and motion to extend the time frame for discovery (ECF No. 72).

2. On September 13, 2024, the Court granted motions by Marquis Aurbach Chtd. and Lucosky Brookman LLP to withdraw their representation of Defendants (ECF Nos. 61 and 62); granted motions by Marquis Aurbach and Lucosky Brookman LLP motion to extend time (ECF No. 73) and motion to shorten time (ECF No. 74). ECF No. 76. The Court further ordered Defendants to respond to SEC's recent discovery motions (ECF Nos. 65, 71, and 72) by November 11, 2024.

3. On September 18, 2024, Attorney Ross C. Goodman entered an appearance in this matter on behalf of Mr. Shinderman (ECF No. 77) and Attorney Richard Bruce Herman's verified petition (ECF No. 78) for permission to practice pro vice in this matter on behalf of Mr. Shinderman was approved on September 19, 2024, the Court granted. ECF No. 79.

4. The Parties met for a conference on November 5, 2024 to discuss additional time familiarize with the details on this case, review additional discovery, and discuss settlement.

5. The Parties have agreed to extend the deadline for Defendants to file a response to Plaintiff's Motion from November 11, 2024, to December 11, 2024.

6. As part of this extension, the parties request to continue the dispositive motion deadline to sixty (60) days from the conclusion of fact discovery (if the Court grants one or more of the SEC's pending motions (ECF Nos. 65, 71 and 72) or sixty (60) days from when the Court denies the SEC's motions to compel (ECF Nos. 65, 71 and 72).

STIPULATED AND AGREED TO:
Dated this 6th day of November 2024.

By: /s/Edward J. Reilly
Edward J. Reilly Esq.
Derek Bentsen, Esq.
Ada Fernandez Johnson, Esq.
Katherine H. Stella, Esq.
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1 *and Exchange Commission*

2 By: /s/ Ross C. Goodman

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6 *Attorneys for Defendant Alan*

Shinderman

7 By: /s/ Richard B. Herman

8 Richard B Herman. Esq.

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9 *Attorney for Defendant Alan Shinderman*

11 **IT IS SO ORDERED.**

12 

13 Daniel J. Albregts

14 United States Magistrate Judge

15 DATED: 11/8/2024